COASTAL CONSERVANCY

Staff Recommendation October 17, 2019

REGIONAL FOREST AND FIRE CAPACITY PROGRAM

Project No.19-010-01
Project Manager: Tom Gandesbery

RECOMMENDED ACTION: Authorization to disburse up to \$3,067,000 of grant funds from the California Natural Resources Agency's Regional Forest and Fire Capacity Program to four public agencies and non-profit organizations to carry out planning and implementation projects that will improve forest health and wildfire resiliency, facilitate greenhouse gas emissions reductions, and increase carbon sequestration in forests.

LOCATION: Counties of Marin, Alameda, Contra Costa, San Mateo, Santa Cruz, Monterey, San Luis Obispo.

PROGRAM CATEGORY: Climate Change

EXHIBITS

Exhibit 1: Program Area Maps

Exhibit 2: Environmental Impact Report

Exhibit 3: Letters of Support

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Section 31113 of the Public Resources Code:

"The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed three million and sixty-seven thousand dollars (\$3,067,000) to the following_nonprofit organizations and public agencies to carry out planning and implementation projects that will improve forest health and reduce fire threat and that may reduce greenhouse gas (GHG) emissions and increase carbon sequestration within the State Coastal Conservancy's jurisdiction as follows:

• Golden Gate National Parks Conservancy, manager of the Tamalpais Lands Collaborative ("One Tam"): Seven hundred twenty-five thousand eight hundred dollars (\$725,800) to

- improve vegetation mapping, develop forest management plans and projects, conduct community education and outreach, and implement demonstration projects.
- <u>Santa Cruz County Resource Conservation District</u>: One million three hundred and twenty three thousand two hundred dollars (\$1,323,200) to improve vegetation mapping using GIS, establish a forest management permit coordination program, develop forest management plans and projects, implement demonstration projects and conduct outreach in San Mateo, Santa Cruz, Monterey, and San Luis Obispo Counties.
- <u>East Bay Regional Park District (EBRPD)</u>: Seven hundred and fifty thousand dollars (\$750,000) to develop forest management plans and projects, secure permits, conduct stakeholder coordination, education and outreach, and implement demonstration projects in western Alameda and Contra Costa Counties.
- <u>Cachuma Resource Conservation District:</u> Two hundred and sixty-seven thousand dollars (\$267,000) to work in conjunction with the Montecito Fire District and Community Environmental Council to develop fire risk models and conduct community stakeholder engagement, education and outreach in Santa Barbara County.

This authorization is subject to the following conditions:

- 1. Prior to commencement of each project, each grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:
 - a. A detailed work program, schedule, and budget.
 - b. Names and qualifications of any contractors to be employed in carrying out the project.
 - c. A plan for acknowledgement of Conservancy and California Natural Resources Agency (CNRA) funding.
 - d. Evidence that all permits, and approvals required to implement the project have been obtained.
 - e. Evidence that the grantee has entered into agreements sufficient to enable the grantee to implement, operate, and maintain the project.
- 2. In carrying out each project, each grantee shall comply with all applicable requirements associated with disbursements from the Greenhouse Gas Reduction Fund (GGRF), including all requirements set forth in the Air Resources Board's GGRF Funding Guidelines.
- 3. In implementing its project, the EBRPD shall comply with all mitigation measures and monitoring and reporting requirements for its project that are identified in the <u>Final Environmental Impact Report Mitigation Monitoring and Reporting Program for the 2010 Wildfire Hazard Reduction and Resource Management Plan</u> (see Exhibit 2) and in any permits, approvals or additional environmental documentation required for the project."

Staff further recommends that the Conservancy adopt the following findings:

"Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

- 1. The proposed authorization is consistent with Division 21 of the Public Resources Code Section 31113, regarding addressing climate change and potential climate change impacts.
- 2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
- 3. The Conservancy has independently reviewed and considered the <u>Final Environmental Impact Report for the 2010 Wildfire Hazard Reduction and Resource Management Plan</u> (EIR) attached as Exhibit 2 of the accompanying staff recommendation, which was certified by EBRPD on April 21, 2010 pursuant to the California Environmental Quality Act (CEQA).
 - a. The EIR identifies "potentially significant" effects from project implementation in the areas of Biological Resources, Geology, Cultural Resources and Noise. With regards to these impacts, the Conservancy finds that the project, as modified by the incorporation of the mitigation measures identified in the EIR, avoids, reduces, or mitigates all possible significant environmental effects of the project except for the impacts identified in finding 3b below.
 - b. The EIR determined that the project may result in "significant and unavoidable" impacts to Visual Resources (temporary adverse visual effects to the scenic character of the project area. Specific environmental (forest health), economic and social (reduction of fire risk and damage to persons and property) described in the accompanying staff recommendation and detailed in the EIR outweigh and render acceptable this unavoidable adverse environmental effect because the project will result in the long-term benefits of reduced threat of wildfire within the forested areas as well as wildland-urban interface (WUI), improved forest health by removing non-native and senescent tree stands, reduced tree density, a potential increase in carbon sequestration, and improved biodiversity.
 - c. There are no feasible mitigation measures which would further avoid or reduce the potential impacts associated with the project. Alternatives to the project analyzed in the EIR are infeasible in that they do not achieve the project objectives of decreasing the threat of catastrophic wildfires within the Study Area and, specifically, within the wildland-urban interface. The Preferred Alternative meets the goal of the Plan in that it reduces wildfire hazards as well as maintaining and enhancing ecological values for plant and wildlife habitat consistent with fire reduction goals and it provides a vegetation management plan which is both financially and environmentally sustainable on an on-going basis.

4. The Golden Gate National Parks Conservancy is a nonprofit organization existing under section 501(c)(3) of the U.S. Internal Revenue Code, and whose purposes are consistent with Division 21 of the Public Resources Code."

PROJECT SUMMARY:

Staff recommends that the Conservancy authorize disbursement of up to \$3,067,000 to four public agencies and non-profit organizations for projects located in eight counties that will improve forest health and reduce fire threat and that may reduce greenhouse gas (GHG) emissions and increase carbon sequestration. . The proposed authorization would be funded by a block grant to the Coastal Conservancy from the California Natural Resource Agency (CNRA) under its Regional Forest and Fire Capacity Program (RFFCP). The Conservancy is one of nine recipients of RFFCP block grants (Exhibit 1A1 and 1A2). The goal of the RFFCP is to increase regional capacity to prioritize, develop, and implement projects that improve forest health and fire resiliency, facilitate greenhouse gas emissions reductions, and increase carbon sequestration in forests throughout California. The RFFCP identifies four general types of work that are eligible for funding under the program: 1) Preparation of Regional Priority Plans that identify and prioritize forestry, fire protection, and forested watershed improvement projects needed to achieve regional and statewide public safety, climate resiliency, and ecosystem goals; 2) Development of projects and permit applications; 3) Implementation of demonstration projects and 4) Outreach, education and training. Through this work, the program seeks to implement the 2018 California Forest Carbon Plan. The Forest Carbon Plan focuses on how to restore resilience to California's forestlands, creating forests that are adaptive to climate change and reliable long-term carbon sinks, rather than sources of carbon emissions from wildfire.

The projects composing the proposed authorization focus on the Wildland Urban Interface, where the impacts of wildfire pose the highest risks (see Exhibit 1A3). The WUI is generally defined as the zone where residential development is intermingled with undeveloped forested or other naturally vegetated areas prone to wildland fire. The WUI is not a place, per se, but a set of conditions that can exist in nearly every community. Each of the efforts proposed under this authorization is discussed in more detail below.

<u>Tamalpais Lands Collaborative ("One Tam")</u>: Marin County

\$725,800

The Tamalpais Lands Collaborative (One Tam) is a partnership of four state, federal and local agencies, and the Golden Gate National Parks Conservancy (GGNPC), working together to improve management and advance the scientific understanding of the ecosystem health on and adjacent to Mount Tamalpais. For this project, the GGNPC would be the Conservancy's grantee, and would work closely with other One Tam partners to complete the project. The work will focus on the following key components:

- Complete a high-resolution digital vegetation map set for the entire county which will include delineating over 100 distinct vegetation types, relative estimates of hardwood and conifer densities within stands, and 3D models of fuel profiles. It will also identify areas degraded by drought, pitch canker, Sudden Oak Death, and other pathogens. The maps will assist the One Tam partners in identifying high priority sites for both fuel load reduction and forest revitalization work and will aid in estimating existing stand carbon balances which will be needed if One Tam applies for subsequent greenhouse gas (GHG) mitigation grants from CALFIRE.
- Develop a comprehensive framework for future compliance with environmental regulations. The intent is to identify gaps and limitations in existing documents, options for amending existing compliance documents, and opportunities to expedite or streamline new compliance processes as needed.
- Identify projects, conduct site assessments, and explore treatment options with the goal of improving project-readiness for future grant opportunities.
- Complete a 30-acre forest health pilot project, located near Kent Lake, that was started
 in 2014 as a demonstration project. The project consists of five 6-acre sets of four
 replicated treatments. The project evaluates various vegetation removal methods and
 revegetation strategies. Within each block there are smaller sampling plots where
 vegetation is mapped and carbon and other parameters are measured. In addition to
 the test plots, there is a 6-acre control area. RFFCP funding will also be used to monitor
 and maintain the project.
- Develop metrics for measuring forest health, focusing on the impacts of Sudden Oak Death. This work will be done in collaboration with the U.S. Forest Service and researchers from Cal Poly-San Luis Obispo, U.C. Davis, and Marin Municipal Water District (MMWD).
- Conduct outreach to practitioners and the local community, including site tours in order to share results of studies and field demonstrations.

Site Description: Mount Tamalpais and its surrounding watershed lands encompass over 25,000 acres of open space (Exhibit 1A4). Public lands include Mount Tamalpais State Park, Muir Woods National Monument, the Golden Gate National Recreation Area, Marin Municipal Water District Lands, and multiple County parks and preserves. Projects will be planned that are located on property owned by California State Parks, the National Park Service, Marin Municipal Water District, and Marin County Parks and Recreation.

There has not been a significant fire on Mount Tamalpais in 74 years. This, combined with growth of invasive species, has resulted in high fuel loads in the mountain habitats. CALFIRE has determined that the risk of wildfire in this area varies from high to very high.

A variety of habitat types are found within the watersheds of Mount Tamalpais including redwood and mixed pine and Douglas fir forests, oak woodlands and chaparral. On the north,

east and southeast sides of the mountain, there is significant urban development in Mill Valley and the communities along Sir Francis Drake Boulevard. The forest health pilot project sites are located within areas that are representative of the forest and chaparral that are adjacent to residential development. At this wildland urban interface, the vegetation could provide a source of ignition to residential communities under certain meteorological conditions, particularly on the east and southeast sides of Mount Tamalpais in the communities from Fairfax running south to Mill Valley (Exhibit 1A4 and 1A5).

Santa Cruz RCD Four-County Partnership:

\$1,324,200

San Mateo, Santa Cruz, Monterey and San Luis Obispo Counties

The Santa Cruz RCD will coordinate a Resource Conservation District Partnership in San Mateo, Santa Cruz, Monterey and San Luis Obispo counties to further the goals of the RFFCP. The four RCDs will share resources in order to increase technical capacity, vegetation mapping including GIS analysis, stakeholder coordination, education and outreach, as well as planning, permitting, and implementation of demonstration projects. The four RCDs will carry out work in each of their respective counties but will also share resources, such as a consulting forestry specialist who will be an employee of the Santa Cruz RCD but will also work with San Mateo County, and a similar specialist currently with the Monterey County RCD will assist with work in San Louis Obispo County. Work funded under this grant is complemented by a recently awarded grant by the California Department of Conservation to the Santa Cruz RCD for its watershed coordination across the four-county region. Working together, funding from these two grants greatly expands the capacity of the RCDs to plan and implement projects.

In addition to the above planning tasks, the RCDs will implement the projects described below. These scalable demonstration projects will leverage matching funds and will serve as examples of the wildfire resiliency work that RCDs are able to implement at the local, neighborhood, and landscape scales.

• Santa Cruz RCD:

o Lockhart Gulch Shaded Fuel Break – The RCD of Santa Cruz County will design and prepare permits for a new four-mile shaded fuel break along the main ridgeline between Lockhart Gulch Road and Zayante from Mt. Herman Road to Weston Road in Santa Cruz County (see Exhibit 1, Program Area Maps). In a shaded fuel break (SFB), brush that serves as ladder fuel in a wildfire is removed while leaving larger trees that are more resilient to fire. Cooperating landowners within the project area include the Land Trust of Santa Cruz County, San Lorenzo Valley Water District, one large private landowner (the Suhr family), and properties belonging to at least 3 smaller private landowners. This SFB would range from 50' to 200' wide depending on terrain and vegetation and would be accomplished with a combination of masticator and contracted hand crews. Environmental consulting assistance will be necessary as a portion of the SFB crosses ponderosa pine sandhill habitat. The Sand Hills are located in

the San Lorenzo Valley, Scotts Valley and Bonny Doon areas and are composed of the Zayante Soil, a coarse sand derived from outcroppings go ancient marine sediments. The soil supports two endemic plant communities: the sand chaparral, and sand parkland, which features large ponderosa pines and diverse and abundant wildflowers. The remainder of the SFB is over mixed evergreen, oak woodland and chaparral habitat. Santa Cruz RCD would move this project through the final design and permitting phases and would secure landowner agreements with project partners in coordination with CAL FIRE. Implementation funds would be secured through a different funding source (grant funds or Governor's budget).

- o Graham Hill Shaded Fuel Break The RCD of Santa Cruz County will continue work started in 2018 under a previous CALFIRE grant on the Graham Hill Shaded Fuel Break along Graham Hill Road (Exhibit 1C3). The completion of this SFB will benefit the at-risk communities of Felton and Scotts Valley. Its completion and continued monitoring of previously cleared sites will reduce wildfire risk for approximately 150 habitable structures. The treatment area that remains to be completed spans 8.5 acres of land along Graham Hill Road. The Graham Hill Corridor is the primary evacuation route for more than 23,000 residents of San Lorenzo Valley. Also, the San Lorenzo River Watershed, in which this project is located, is the source of drinking water for approximately 100,000 Santa Cruz area residents. Mitigating fire risk will help maintain the quality of this important drinking water supply. The completion of the Graham Hill project will also enhance Sand Hill endangered species habitat through removal of invasive acacia on private land and purposeful soil disturbance on State Parks land (many of the endemic species require disturbance for germination).
- out to reduce fuel loading in a eucalyptus stand adjacent to the Cliffwood Estates
 Mobile Home Park in Soquel, CA where approximately 70 habitable structures are
 located (Exhibit 1C2). Decades of accumulated downed material and growth of
 understory vegetation have created a significant volume of ladder fuels that make the
 eucalyptus stand highly vulnerable to crown fire, posing a serious threat to the primarily
 elderly, low-income, disadvantaged community. The project proposes to remove
 juvenile eucalyptus (8" DBH and less) and understory brush, stump treat cut eucalyptus,
 prune trees to a height of 8 to 10', and remove large accumulations of sound (not rotted
 or punky) downed woody material up to approximately 8" in diameter. All of the cut
 material will be chipped and spread within the project footprint. The treatment area
 within the eucalyptus stand is approximately 2.6 acres. All permitting requirements will
 be prepared prior to the start of the project.
- No-Cost Chipping Program The RCD will provide no-cost, wood-chipping services countywide and co-funded by CAL FIRE's Fire Prevention Grant Program and the California Fire Safe Council. Defensible space around homes will be achieved through community-level, neighborhood chipping projects (to support landowners who will clear

and prepare piles for chipping on site). There are 19 communities at risk in Santa Cruz County: Aptos, Aptos Hills-Larkin Valley, Ben Lomond, Bonny Doon, Boulder Creek, Capitola, Corralitos, Davenport, Day Valley, Felton, Freedom, Interlaken, Opal Cliffs, Rio Del Mar, Twin Lakes, Santa Cruz, Soquel, Scotts Valley, and Watsonville. Most are located entirely within the Wildland Urban Interface, save for those with larger urban areas. Approximately 10 neighborhood chipping projects are proposed in support of approximately 500 landowner defensible space creation and maintenance projects over three years.

San Mateo RCD

- El Granada Fuel Reduction The San Mateo RCD will implement a fuel-load reduction project near the unincorporated town of El Granada and associated Quarry Park. The project would target the removal of large Eucalyptus stands, include herbicide treatment of freshly cut Eucalyptus stumps to prevent re-sprouting, and the creation of shaded fuel breaks within the community and bordering the eastern edge and within Quarry Park and would continue a shaded fuel break work within Quarry Park that was initiated earlier in 2019.
- O Highway 84 fuel break The RCD will work with Fire Safe-San Mateo County, CAL FIRE and other partners on the Highway 84 Fuel-break project. Fuel load reduction projects have occurred along sections of the highway with grant funding secured by the Fire Safe Council; however, the available funding to date has been inadequate to treat the entire project area and ongoing maintenance is required to maintain the benefits of previous efforts. This project would complete fuel reduction along an additional section of Highway 84, especially the western portion of the highway.
- Wood Chipping Program The RCD will assist Fire-Safe San Mateo in implementing a county-wide chipper program in which a brush chipper and crew are provided to property owners who trim and clear their own property (See map Exhibit 1B1).

Monterey County RCD

Carmel Valley Fuel-break System – The RCD of Monterey County will help create the Carmel Valley Fuel-break System — a series of at least two fuel-breaks that cover sections of Carmel Valley and the Los Padres Strategic Fuel-break (see maps Exhibit 1D1). The project will be located in areas of higher fuel loading as well as limited ingress/egress. Pre-project activities include meeting with community leaders for scoping; an assessment of fuels relative to community areas; CEQA pre-analysis of potentially impacted resources; and developing management plans. Additional grant money will be requested through the CALFIRE Fire Prevention grant program to implement this large-scale project.

- Los Padres National Forest fuel breaks –The RCD will work with the Los Padres National Forest to implement its Strategic Community Fuel-break project which consists of fuel-breaks adjacent to local communities in the Big Sur region (Big Sur, Palo Colorado, Jamesburg, Cachagua, see Exhibit 1D2). Additionally, another landowner will participate in the Los Padres National Forest (LPNF) fuel breaks in order for the project to meet the minimum acreage requirement (1,000 acres) to qualify for the California Climate Investments Forest Health grant program. Scoping potential partners will be part of this process; partner lands need to be forested and ideally contiguous with LPNF lands. NEPA scoping may be required for this project (for the LPNF), as well as CEQA (partner lands).
- The RCD will also work in conjunction with CALFIRE and Fire-Safe Council of Monterey County on various private properties to demonstrate approaches to creating defensible space.

Upper Salinas-Las Tablas RCD (San Luis Obispo County):

- Willow Creek Fuels Reduction Program The Upper Salinas-Las Tablas RCD (USLTRCD) will undertake the Willow Creek Fuels Reduction Program in partnership with four large, private landowners in the Adelaida area south of Lake Naciemento. The Willow Creek Fuels Reduction Program occurs in a high fire hazard area with oak woodlands and chaparral along the Santa Lucia Mountain Range. The proposed project will serve as a demonstration project to other adjoining and neighboring landowners to work collaboratively to reduce fire risk by reducing fuels through vegetative management and oak woodland understory thinning. The USLTRCD will coordinate with landowners, CalFire, and SLO Firesafe Council on design specifications for fuel reduction in approximately 200 acres of oak woodlands. Willow Creek is a tributary to Paso Robles Creek, a high priority watershed for endangered species such as steelhead and California Red-legged frogs.
- The USLTRCD will also undertake Santa Rita Ranch Estates Fuels Reduction by working with participating landowners to develop a demonstration project for fuel reduction by understory clearing and forest stand thinning. This site is also in a high fire hazard area in oak woodlands and chaparral. In contrast to the Willow Creek Fuels Reduction Program, primary landownership in the Santa Rita Ranch Estates Fuels Reduction project are rural residential with acreages ranging between a couple dozen to several hundred acres. The potential acreage for fuel reduction projects, including vegetative management with hand crews, is approximately 1,200 acres of oak woodland.

Site Description: The four RCDs will carry out work in each of their respective counties, but will also share resources, as described above.

The San Mateo County RCD covers over 157,000 acres in the western, coastal portion of the county, including all watersheds in the county that drain into the Monterey Bay National

Marine Sanctuary. Most of this area is in the Santa Cruz Mountains with coastal prairie habitat scattered in and amongst redwood dominated forests that extend from the ridge tops to the ocean. There are several special-status wildlife species in the area, including coho salmon, steelhead trout, the California red-legged frog and San Francisco garter snake.

The Santa Cruz RCD works in a county that is home to 26 rare plant and animal species, a number of globally rare habitats, more than 850 miles of waterways, 18,000 acres of grasslands, and over 1,500 acres of wetlands; however, past land use and land practices have resulted in the loss or degradation of these critical habitats. The abundance of invasive plants in Santa Cruz County poses a real threat to native plants and wildlife (Exhibit 1C1A)

In San Mateo and Santa Cruz counties, the RCDs will work with landowners to plan and implement projects located in areas of high and very high fire hazard, in mixed-conifer forest, oak woodlands, eucalyptus plantations, and chaparral and coastal sage scrub. Properties are in both public and private ownership. The Santa Cruz RCD will work in the mountains of Santa Cruz County at various sites, with vegetation ranging from chaparral to eucalyptus and redwood (see Maps Exhibit 1C1,2 and 3). The Graham Hill fuel break project described above is located in the unique Sand Hills habitat near Scotts Valley (Exhibit 1C3)

Monterey County features the Santa Lucia Mountains, Gabilan Range Mountains, the Salinas Valley, the Monterey Peninsula and the Elkhorn Slough system. Vegetation types range from coastal scrub and maritime chaparral along the coast to coast live oak woodlands, Monterey pine forests, mixed conifer forests, redwood galleries, annual grasslands, interior and montane chaparral, blue oak and gray pine woodlands and Monterey cypress stands. Large portions of the County are under federal ownership including the Los Padres National Forest, Fort Hunter-Liggett, and the Fort Ord National Monument with smaller portions under state ownership. Several threatened and endangered plant and animal species are found in Monterey County, including arroyo toad, California tiger salamander, Gowen's cypress, Monterey spineflower, Monterey clover, Menzies' wallflower, Smith's blue butterfly, California condor, California clapper rail and San Joaquin kit fox, among others.

For this project the Monterey County RCD will work in the Carmel Valley and on private and public lands adjacent to the Los Padres National Forest (Exhibit 1D2).

The Upper Salinas-Las Tablas RCD (USLTRCD) area covers over 1.8 million acres that spans the southern Santa Lucia Range and the western portion of the Temblor Range. Vegetation ranges from Monterey pine in Cambria, mixed conifer forest in the mountains, oak woodlands in the interior hills, California sycamore, chaparral, blue oak savanna and annual grasslands. Wildlife species at risk in this area include blunt-nosed leopard lizard, Morro Bay kangaroo rat, Tipton kangaroo rat, California condor, southern steelhead, California tiger salamander, Southwestern willow flycatcher and others. Current conditions include a growing population in San Luis Obispo county (expected to double in size by 2050), riparian degradation of the Upper Salinas River and the conversion of wildlands to vineyards and orchards. Fire suppression within the range lands, coupled with dense growth by non-native plants has further increased fuel loading

to hazardous levels. The USLTRCD will work with private landowners to implement strategic fuel breaks to lesson wildfire risk while protecting sensitive species and habitats. The USLTRCD will work in the Adelaida area, located south of Lake Naciemento (Exhibit 1D3).

East Bay Regional Parks District Contra Costa and Alameda Counties

\$750,000

The East Bay Regional Park District in conjunction with the Diablo Firesafe Council and Hills Emergency Forum will conduct stakeholder coordination, education and outreach, planning, permitting, and implementation of demonstration projects. The hot and dry summers of the Bay Area, the steep topography of the East Bay Hills, seasonal wind patterns, flammable wildland vegetation, dense development patterns adjacent to parklands, and limited firefighting access all contribute to creating a substantial regional fire threat. The vegetation management activities anticipated as part of this project will reduce the wildfire hazard and could help save lives and property.

The Park District will undertake fuel reduction and forest management at 29 sites totaling over 400 acres (see map Exhibit 1E). The work will include the following key aspects:

- Projects will be implemented in accordance with the District's 2010 <u>Wildfire Hazard</u>
 <u>Reduction and Resource Management Plan</u>. The Plan's Study Area comprises
 approximately 19,000 acres of parks and open space in western Alameda and Contra
 Costa County, including 13 hillside parks and seven shoreline parks. The focus of the
 Plan is on the wildland-urban interface along the western edge of the East Bay hill parks
 and the shoreline parks of Point Pinole and Miller/Knox, where wildfire hazards and fuel
 loads are present.
- Sites were selected using the criteria of include high fuel load, stand density, known occurrence of special-status plant and animal species, proximity to residential development, and the potential to act as a strategic fuel break. Many of the treatment areas are adjacent to residential development or critical infrastructure (see Maps Exhibit 1B).
- The proposed treatment sites, which are referred to as Recommended Treatment Areas (RTA), were selected from over 130 such areas which were determined through the District's wildfire hazard assessment process (Exhibit 1E).

Site Description: The treatment sites are located throughout the watersheds of western Contra Costa and Alameda Counties, from Pinole to Castro Valley on public and private Lands (see maps, Exhibit 1E) that include redwood and mixed pine and Douglas fir forests, eucalyptus and Monterey pine plantations, coyote brush scrub and coastal scrub, and oak woodlands.

The 29 proposed treatment sites, which are referred to as Recommended Treatment Areas, were selected from over 130 such areas which were determined through the District's wildfire hazard assessment process. They include heavily forested areas on steep slopes that are

adjacent to residential communities, such as El Sobrante, Richmond, Kensington, Berkeley, Oakland and Castro Valley (Exhibit 1E).

The threat of catastrophic wildfires under Diablo-wind conditions (winds that blow from the east to west and usually occur during the late summer and fall) presents significant risks to public health and safety, homes, and property along the ever-expanding wildland-urban interface. During the 75-year period between 1923 and 1998, 11 Diablo wind-driven fires burned a total of 9,840 acres, destroyed more than 3,500 homes, took 26 lives, and resulted in over \$2 billion in financial losses; three large westerly wind-driven fires also burned 1,230 acres and consumed four homes. The 1923 Berkeley Fire destroyed 568 homes; the 1991 Tunnel Fire destroyed approximately 3,400 residences.

Cachuma RCD \$267,000 Santa Barbara County

The Cachuma RCD will conduct planning, mapping and assessment for a Regional Priority Plan to reduce wildfire risk and improve forest and habitat health on public and private land in the urban/wildland interface in Santa Barbara County. No demonstration projects are proposed at this time. The planning, mapping and assessment phase will engage key stakeholders including public agencies, large landowners, fire districts (CWPPs), Fire Safe Council, scientific experts, agriculture and conservation practitioners, and other community members.

The mapping and modeling will build off the Conservancy-funded <u>Santa Barbara County Conservation Blueprint</u> and will aggregate data and create maps (land uses, public/private boundaries, veg cover, habitat, geomorphology, current and proposed fire breaks, building footprint, vulnerable structures, climate projections, etc. as well as analysis and modeling of GIS data with input from stakeholders (fire risk modeling and treatment spatial recommendation modeling).

The RCD will also conduct community stakeholder engagement and outreach and this work will dovetail with a Data Needs and Gap Assessment. It is hoped that this work with help identify priority projects and help develop permitting pathways including an environmental compliance framework guide. Lastly, in partnership with the Community Environmental Council, the RCD will help hold one or more roundtable workshops on fire and forest health focused on chaparral and oak woodlands of the adjacent Santa Ynez Mountains.

Site Description: The study area will include zones of high and very high fire hazard dominated by chaparral and coastal sage scrub with a relatively small proportion of oak woodlands and scattered pine stands. The planning area will include all of Santa Barbara County. Focus will be on the agricultural /wildland interface and the urban/wildland interface in areas of higher fire severity (Exhibit 1F). The Los Padres National Forest (LPNF) is not anticipated to be included in this work, unless there is a direct relationship between a USFS project and project outside of the LPNF.

Project History: The Regional Forest and Fire Capacity Program (RFFCP) came about largely from the recommendations of the 2018 <u>California Forest Carbon Plan</u>, that states that in California there are "33 million acres of forestland and an urban forest canopy that can capture and clean our water supply, provide habitat for countless wildlife, cool our cities, support local economies, and serve as spiritual and cultural centers for indigenous and local communities across the state. Forested lands also are the largest land-based carbon sink with trees and underbrush drawing carbon from the atmosphere and storing it in their cellulosic structure and in forest soils." However, these lands can become a source of overall net greenhouse gas (GHG) emissions if actions are not taken to enhance their health and resilience and to reduce the threats they face from wildfire, insects, disease, and a changing climate."

Decades of fire exclusion, coupled with drought and the stressors associated with climate warming, have dramatically increased the size and intensity of wildfires and bark beetle infestations. Recent wildfires have been the deadliest, most destructive, costliest, and largest in state history, while more than 129 million trees, primarily in the Sierra Nevada, have died from drought and insects since 2010. It is estimated that as many as 15 million acres of California forests need some form of restoration (Exhibit 1A3).

The Forest Carbon Plan considers opportunities to reverse these adverse trends and firmly establish California's forests as a more resilient and reliable long-term carbon sink, rather than a GHG and black carbon emission source. The Plan identifies multiple strategies needed to promote healthy and resilient wildland and urban forests and to protect and enhance forest carbon and the broader range of public benefits.

The principal goal of the RFFCP is to restore health and resilience to forests at the regional scale for multiple benefits, including climate adaptation. This program aims to increase regional capacity to prioritize, develop, and implement landscape-level forest health and wildfire resiliency projects that have broad support by stakeholders in and affected by the region by:

- Promoting and supporting collaborative planning and implementation of wildfire resiliency and forest health protection, management, and restoration efforts at the landscape or watershed level
- > Coordinating and integrating management of wildfire resiliency and forest health protection, management, and restoration efforts at the regional scale
- ➤ Identifying, prioritizing, and implementing forestry and wildfire protection projects that meet regional and statewide public safety, ecosystem, and public resource goals, and that are consistent with the Forest Carbon Plan

Consistent with the Forest Carbon Plan, the Sierra Nevada Conservancy initiated a Watershed Improvement Program to restore and protect the ecological health and resilience of watersheds and forests within the Sierra Nevada region. The program model aims to increase both the pace and scale of restoration efforts in the mountains. The Budget Act of 2018 appropriated \$20 million in California Climate Investments funding to the California Natural Resources Agency for grants to support regional implementation of landscape-level forest

health projects. Through the RFFCP program, CNRA aims to apply the Sierra Nevada Conservancy's Watershed Improvement Program model to other areas in the Northern, Coastal, and Southern California regions.

In 2019, CNRA asked the Conservancy to assist with implementation of the RFFCP by managing a block grant to address coastal wildfire resiliency.

PROJECT FINANCING

Coastal Conservancy	\$ 3,067,000
Project Total	\$3,067,000

The source of Conservancy funds for the proposed authorization is a block grant from the CNRA specifically for the Regional Forest and Fire Capacity Program. Funding for the RFFCP is derived from the Greenhouse Gas Reduction Fund (GGRF), also referred to as California Climate Investment dollars.

The RFFCP Grant Guidelines state that block grant recipients must consider each of the following when prioritizing projects:

- Areas that contribute to high wildfire risk faced by adjacent or nearby communities
- Forests projected to be at risk due to climatically driven stressors
- Forests at greatest risk to high-severity mortality events (e.g., fire, insect outbreak)
- Forests at high risk of type-conversion (e.g., forest to shrub or grass vegetation)
- Areas with high habitat values at risk, such as spotted owl activity centers
- Headwater areas that provide significant water supply
- Areas that need to be reforested after high mortality events
- Forests at risk of conversion to other uses, including development and agriculture
- Opportunities for follow-up "maintenance" treatments via prescribed fire or other fuels reduction techniques
- Availability of adequate workforce and infrastructure to complete projects.

The proposed suite of projects is consistent with the RFFCP Grant Guidelines in that the proposed planning and implementation will focus on high and extremely high fire risk areas, and grantees will work to identify forested areas that are under stress due to disease and lack of a natural fire regime. Grantees will seek to develop best practices for forest management, including recommended maintenance activities such as managing shaded fuel-breaks, and will increase the staff expertise and support available to the public.

The proposed authorization will be funded by GGRF. The Greenhouse Gas Reduction Fund Investment Plan and Communities Revitalization Act (Health and Safety Code (HSC) Sections 39710 – 39723) requires that GGRF funds be used to (1) facilitate the achievement of reductions of GHG emissions consistent with the Global Warming Solutions Act of 2006 (HSC Sections 38500 *et seq*), and (2) to the extent feasible, achieve other co-benefits, such as maximizing economic, environmental and public health benefits and directing investment to disadvantaged communities (HSC 39712(b)). The Global Warming Solutions Act of 2006 sets forth (among other things) certain GGRF funding priorities (HSC Section 38590.1).

The proposed projects are consistent with the use of GGRF funding because they will reduce greenhouse gas emissions by increasing forest health and wildfire resiliency in the treated forests. This work will also reduce impacts on public health of smoke, stress, and other health impacts associated with wildfires. In addition, at least 10% of the CNRA grant funds must be used to benefit low-income communities. Because of the widespread impact of smoke from wildfire on communities, the proposed projects will benefit low-income communities throughout the region.

Work carried out with this funding will, in many cases, be matched by future grants or will provide match for existing grants issued by CALFIRE and county agencies (see "Readiness" in Required Criteria, below).

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

All of the recommended projects would be undertaken pursuant to Section 31113 of Chapter 3 of Division 21 of the Public Resources Code, which authorizes the Conservancy to address the impacts and potential impacts of climate change on resources within the Conservancy's jurisdiction (Section 31113(a)).

Pursuant to Section 31113(b), the Conservancy is authorized to award grants to nonprofit organizations and public agencies to undertake projects that include reducing greenhouse gas emissions, and addressing extreme weather events, sea level rise, flooding, and other coastal hazards that threaten coastal communities, infrastructure, and natural resources. Consistent with this section, the proposed authorization awards grants to nonprofit organizations and public agencies to undertake the projects described in the "Project Summary" section, which maximize public benefits by facilitating the reduction of greenhouse gas emissions from increased wildfires due to climate change.

CONSISTENCY WITH CONSERVANCY'S <u>2018-2022 STRATEGIC PLAN</u> GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 7, Objective A** of the Conservancy's 2018-2022 Strategic Plan, the proposed projects funded by this program will advance Goal 7 of developing plans for projects

that foster the long-term viability of coastal working lands, including...timber operations to reduce impacts of their operations on wildlife and water quality.

Consistent with **Goal 7**, **Objective B** of the Conservancy's 2018-2022 Strategic Plan the projects funded by this program will advance Goal 7 of implementing projects that foster the long-term viability of coastal working lands.

Consistent with **Goal 8, Objective B** of the Conservancy's 2018-2022 Strategic Plan, the proposed projects help plan and design adaptation projects to increase resilience to climate change impacts.

Consistent with **Goal 8, Objective C** of the Conservancy's 2018-2022 Strategic Plan, the proposed project will implement projects to increase resilience to climate change impacts using nature-based solutions and other multi-benefit strategies.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA & GUIDELINES:

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

Required Criteria

- 1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
- Consistency with purposes of the funding source: See the "Project Financing" section above.
- 3. Promotion and implementation of state plans and policies:
- The proposed projects will help implement the <u>California Forest Carbon Plan</u>, CNRA, 2018 which calls for restoration of natural fire regime and forest composition through a multitude of approaches including thinning, prescribed burns, invasive vegetation management and shaded fuel breaks.
- The proposed projects are consistent with the 2019 <u>Community Wildfire Prevention & Mitigation Report</u> which urges state and local agencies to implement the goals of the Carbon Forest Plan and lays out recommendations to agencies to increase the scale and pace of management and mitigation actions to improve forest health and resiliency.
- The proposed projects are also consistent with the <u>Forests and Rangelands Companion</u> <u>Plan, California State Wildlife Action Plan Update</u> (CDFW 2015) in that projects will seek to create a healthier and more resilient forest ecosystem.

- The 2015 Environmental Goals and Policy Report "A Strategy for California @ 50 Million, Supporting California's Climate Change Goals", Goal 6 of the Steward and Protect Natural and Working Landscapes section calls on the State to "Build resilience into natural systems and prioritize natural and green infrastructure solutions". Consistent with this, the proposed authorization will increase resilience of the State's coastal forests.
- 4. **Support of the public:** This project is supported by Fire-Safe Marin; the Diablo Firesafe Council; Firesafe Santa Cruz; the Firesafe Council of San Luis Obispo County; and, the Santa Barbara County Fire Safe Council (Exhibit 3).
- 5. **Location:** The proposed project would be located partially within the coastal zone of Marin, San Mateo, Santa Cruz, Monterey and Santa Barbara Counties. Work will also take place in western Contra Costa and Alameda counties and may include interior (non-coastal zone) portions of San Luis Obispo and Ventura Counties.
- 6. **Need:** CNRA requested that the Conservancy serve as one of nine block grant recipients statewide in order to expand local and regional capacity to address forest health and fire mitigation in the face of climate change. This work is in response to Governor's Executive Order N05-19 which directed CAL-FIRE and other resource and regulatory agencies to work toward common goals and objectives (see Criteria No. 3 above).
- 7. **Greater-than-local interest:** Approaches to minimizing wildfire risk through improved forest health is of interest to land managers and property owners statewide. Regional differences in forest type and ecology exist but lessons learned in one area may be applicable in other areas within a region. Education, outreach and training will be an integral part of this project.
- 8. **Sea level rise vulnerability:** The subject land is situated well above current and projected Year 2100 sea levels.

Additional Criteria

- 9. Urgency: California is facing unprecedented fire risk due to climate change and a growing populace. Governor Newsom has issued Executive Order N05-19 which declared a state of emergency for certain high-risk projects and which approved The Community Wildfire Prevention & Mitigation Report which directs numerous state agencies to work toward common goals and objectives. This project implements the Order.
- 10. **Resolution of more than one issue**: This program addresses three major issues: it seeks to reduce wildfire risk, improve forest health, and will be focused on areas where homes and communities are most at risk, the wildland-urban interface (WUI).
- 11. **Leverage**: See the "Project Financing" section above.
- 12. **Conflict resolution**: Work will focus on ways to reduce fire risk while improving forest health. While some more traditional approaches to reducing fuel load have been in

- conflict with ecological protection, this project seeks to plan, design and implement approaches that achieve some measure of both fire risk reduction and improvement of forest health.
- 13. **Innovation**: Grantees will be encouraged to undertake projects that are innovative, and which may demonstrate novel techniques and approaches.
- 14. **Readiness**: Many of the grantees and potential subgrantees are currently working in this arena, have significant experience implementing a wide variety of projects supported by other grants, and are ready to implement the proposed projects.
- 15. Cooperation: Several grantees are part of existing collaborations amongst local public agencies and non-profits. The Santa Cruz Four-County Partnership is a joint effort to share information and resources between RCDs located in four counties: San Luis Obispo, Monterey, Santa Cruz and San Mateo. One Tam is a collaboration between the Golden Gate Parks Conservancy, National Parks, State Parks, the Marin Municipal Water Agency and the Marin County Parks and Open Space District. These groups share information and resources and work closely together through one point of contact and one fiscal agent.
- 16. **Vulnerability from climate change impacts other than sea level rise:** These grants will address forest health and fire resiliency in the context of anticipated climate change. Forests are believed to be very vulnerable to increased average temperatures, reduced marine fog and longer and more severe droughts.
- 17. **Minimization of greenhouse gas emissions:** This work seeks to mitigate GHG emissions from catastrophic wildfires by lessoning the fire risk, improving forest resiliency to fire and improving carbon sequestration.

CEQA COMPLIANCE:

Staff has reviewed the proposed projects to be undertaken by the Golden Gate National Park Conservancy/One Tam, Santa Cruz County RCD partnership, and the Cachuma RCD, and has determined that the projects are statutorily exempt from the California Environmental Quality Act (CEQA) as described below.

Preparation of forest management plans, vegetation mapping, permit coordination efforts, and other planning activities are statutorily exempt from the requirement to prepare an environmental document under CEQA pursuant to Title 14 California Code of Regulations Section 15262 Feasibility and Planning Studies, which exempts planning and feasibility studies for possible future actions which the agency, board, or commission has not approved, adopted, or funded.

Anticipated brush clearing and other fuel reduction activities are categorically exempt from CEQA under Title 14 California Code of Regulations Section 15304 Minor Alterations as these

efforts would result in minor alterations to the condition of the land and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes.

Projects elements such as vegetation mapping which consist of basic data collection, research, experimental management, and resource evaluation activities and which do not result in a serious or major disturbance to an environmental resource are categorically exempt CEQA under Title 14 California Code of Regulations Section 15306 Information Collection.

Smaller forest thinning and fuel reduction projects are also categorically exempt CEQA under Title 14 California Code of Regulations Section 15333 Small Habitat Restoration. Section 15333 applies to projects which do not exceed five acres in size with the goal of assuring the maintenance, restoration, enhancement, or protection of habitat for fish, plants, or wildlife provided that:

- There would be no significant adverse impact on endangered, rare or threatened species or their habitat pursuant to Section 15065 of Title 14, California Code of Regulation.
- There are no hazardous materials at or around the project site that may be disturbed or removed, and
- The project will not result in impacts that are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

Upon approval, staff will file Notices of Exemption for the One Tam Collaborative, Santa Cruz County RCD partnership, and the Cachuma RCD project.

For efforts in Alameda and Contra Costa County implemented by the East Bay Regional Parks District, EBRPD prepared the <u>Final Environmental Impact Report for the 2010 Wildfire Hazard Reduction and Resource Management Plan</u> (FEIR). The FEIR was approved and certified by EBRPD on April 21, 2010.

The FEIR analyzes a range of alternatives for the Wildfire Hazard Reduction and Resource Management Plan (Plan) as follows:

- No Action Under this alternative the District would not undertake existing or new fuel
 reduction activities to either maintain the exiting fuel reduction zone or to complete
 new projects. Short-term environmental impacts would be less than those under the
 Plan; however, none of the goals and objectives of the plan would be realized.
- **Mitigated Alternative** This alternative includes revisions to the Plan to mitigate impacts identified in the EIR. This alternative would enable the goals and objectives of the Plan to be achieved and would further support implementation of the identified fuel treatment and vegetation management activities included in the Plan.

• Environmentally Superior Alternative – As required by CEQA Guidelines, the District has identified the environmentally-superior alternative and found it to be the same as the Mitigated Alternative because it would incorporate the same additional mitigation measures as the Mitigated Alternative that would reduce potential impacts.

The FEIR identifies several potentially significant effects that can be mitigated to less than significant with mitigation. One significant, unavoidable impact to Visual Resources is also identified. The significant effects and mitigation measures are set forth in the FEIR and summarized in Table 1 of Exhibit 2C (page 7). These mitigation measures are also summarized along with their implementation responsibility, schedule, reporting, and enforcement requirements in the Mitigation Monitoring and Reporting Plan. The discussion below summarizes these impacts and mitigations.

<u>Significant Effects Reduced to Less Than Significant Levels Through Mitigation</u>

Biological Resources

<u>BIO-1 Impact</u>: Replacement of degraded and substandard culvert in stream corridors long Strategic Fire Routes could result in disturbance to aquatic habitats.

Mitigation: The District will implement best management practices (BMPs) when conducting work in and round creeks and streams to replace culverts, as required by Corp of Engineers, USFWS, NMFS and CEFW and RWQCB in a way that minimizes disturbance and prevents erosion and degradation of soils and riparian vegetation. Additionally, the District will obtain all appropriate state and federal permits.

<u>BIO-2 Impact</u>: Work has the potential to disturb nesting raptors and songbirds.

Mitigation: Nest Surveys would be conducted within 15 days prior to treatment if work is performed during nesting season (Feb – July) in order to locate and avoid protected birds.

<u>BIO-3 Impact</u>: Construction and maintenance of the proposed strategic fire break in Claremont Canyon could serve as a conduit for invasive non-native plant species.

Mitigation: The District would revegetate road shoulders with naïve grass sed mix and monitor non-native species as a part of maintenance.

<u>BIO-4 Impact</u>: Implementation of the plan could conflict with federal, state or local ordinances or regulations protecting biological resources and special-status species.

Mitigation: The District will coordinate with USFWS under its existing Biological Opinion (BO) which could be expanded to include activities that implement the Plan. A revised BO may require the District to apply for an incidental take permit or authorization, which may, in turn, require more mitigation measures.

Geology

Geo-1 Impact: Project activities may make slopes instable.

Mitigation: Prior to vegetation removal, the treatment area will be screened against the latest landslide mapping available from the USGS or the State's Geological Survey. Sites located in high risk areas or located in areas with slopes that are within 100 feet of habitable structures will be further analyzed on a case-by-case basis. The District will consult with a qualified professional geologist or geotechnical engineer in such cases.

Cultural

<u>CULT-1 Impact</u>: Implementation could result in impacts to human remains, including those interred outside formal cemeteries.

Mitigation: If human remains or associated burial grounds are encountered during implementation, then the steps required by CEQA Guidelines §15064.5 and Health and Safety Code §7050.5 as well as shall be taken. In addition, staff will follow the Districts Cultural Resources Policy. These regulations require work to be halted within 50 feet of the remains, contacts to the appropriate county coroner's office and work with an archeologist to further evaluate the remains and provide recommendations.

<u>CULT-2 Impact</u>: Implementation may result in the destruction of unique paleontological resources.

Mitigation: In the event that paleontological resources are found during a implementation of the Plan, the District will halt work within at least 50 feet of the finding and will follow procedures similar to finding of human-remains (described above).

<u>CULT-3 Impact</u>: Operational management may exclude cultural resources from long-range planning.

Mitigation: Staff responsible for implementation of the Plan should be involved with and communicate with those who are responsible for cultural resources records and should have input on long-term management of cultural resources.

Noise

NOI-1 Impact: Work under this plan may generate noise and ground-transmitted noise vibrations.

Mitigation: The District will limit noise-producing work that involves the use of large machinery to be undertaken between the hours of 8:00 am to 5:00 pm.

Significant Impact that Cannot Be Mitigated

Visual Resources

VIS-1: Implementation of activities under the proposed Plan (such as vegetation clearing or thinning or prescribed burning) could result in temporary substantial adverse visual effects on the scenic character of the project area and its surroundings. No mitigation was identified, and this was determined to be a significant, unavoidable impact.

Statement of Overriding Considerations

In the event a project has unavoidable significant potential effect, the CEQA Guidelines require the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project (14 Cal. Code of Regulations Section 15093). If the specific project benefits outweigh the unavoidable adverse environmental effects of the project, a Statement of Overriding Considerations may be adopted and the project approved, despite its adverse environmental effects. The EBRPD adopted a Statement of Overriding Considerations as part of its Finding of Facts on April 21, 2010 (Exhibit 2C).

The overall environmental benefits of the proposed project, as detailed in the EIR, warrant the Conservancy's decision to approve the project even though one of the environmental effects of the Management Plan cannot be mitigated. The Wildfire Hazard Reduction and Resource Management Plan will provide significant public benefits by addressing wildfire risk in a manner that minimizes adverse environmental effects and implements resource and habitat management goals. Specifically, the Plan "...provides specific goals, objectives, guidelines, and best management practices (BMPs) to inform and guide wildfire hazard reduction and resource management activities that will be carried out by EBRPD and its contractors."

Specific goals that have been established by EBRPD for the Plan include the following:

- Reduce fire hazards on District-owned lands in the East Bay's wildland-urban interface to an acceptable level.
- Maintain and enhance ecological values for plant and wildlife habitat consistent with fire reduction goals.
- Preserve aesthetic landscape values for park users and neighboring communities.
- o Provide a vegetation management plan which is cost-effective and both financially and environmentally sustainable to EBRPD on an on-going basis.

For these reasons, the Conservancy staff recommends that the Conservancy find that the project, as mitigated, avoids or reduces to less than significant all potentially significant environmental effects, except for one temporary significant and unavoidable impact to Visual Resources. With respect to this potential unavoidable effect, Conservancy staff recommends that the Conservancy find that the public safety, air quality, natural resource, and community benefits of the EBRPD project outweigh the one unmitigated and unavoidable environmental effect of the project, thereby warranting its approval. Although the EIR was completed in 2010, no new CEQA documentation is needed because the Plan has not been revised, and circumstances under which the Plan will be implemented have not changed such that there will be new significant effects or increased severity of existing effects.

Upon Conservancy approval of the proposed projects, Conservancy staff will prepare and file a Notice of Determination.